

# BINGHAM

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March 19, 2009

## VIA EMAIL AND OVERNIGHT MAIL

John V. Giusti  
Acting Chief, International Bureau  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Petition for Protection from Whipsawing and Stop Settlement  
Payment Order on U.S.-Tonga Route (IB Docket No. 09-10) -  
Supplemental Response of Primus Telecommunications, Inc.**

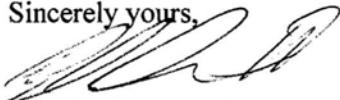
Dear Mr. Giusti:

On March 9, 2009, Primus Telecommunications, Inc. ("Primus"), filed a response to the Commission's letter of February 18, 2009, requesting information concerning termination rates paid by Primus to terminate traffic in the Kingdom of Tonga. In that response, Primus indicated that it would need time to recover rates from the period prior to September 1, 2008, from off-line storage. Primus hereby supplements its response with termination rates prior to September 1, 2008.

Prior to September 1, 2008, Primus and Shoreline Communications Ltd/Digicel (Tonga) Limited had an agreed upon termination rate of \$.111 for Tonga-destined traffic. This rate was in effect for all of 2008 prior to September 1.

Primus believes this supplement, coupled with the March 9, 2009 response, fully responds to the Commission's February 18, 2009 inquiry. If you have any other questions, please contact the undersigned.

Sincerely yours,



Douglas D. Orvis II  
Counsel to Primus Telecommunications, Inc.

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